

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

SHAI DAVID

Plaintiff,

vs.

ANDREW "ANDY" J. SAVAGE, III, ESQ.
AND THE SAVAGE LAW FIRM, PA

Defendants.

Case No: 2:19-cv-03139-BHH

**PLAINTIFF'S ANSWERS TO LOCAL
CIVIL RULE 26.01 INTERROGATORIES**

Plaintiff Shai David, by and through his undersigned attorneys, hereby answers
Local Civil Rule 26.01 Interrogatories as follows:

1. State the full name, address, and telephone number of all persons or legal
entities who may have a subrogation interest in each claim and state the basis and extent
of said interest.

ANSWER: None aware of.

2. As to each claim, state whether it should be tried jury or non jury and why.

ANSWER: All claims should be tried by jury as it is Plaintiff's right.

3. State whether the party submitting these responses is a publicly owned
company and separately identify: (1) each publicly owned company of which it is a parent,
subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent
or more of the outstanding shares or other indicia of ownership of the party; and (3) each
publicly owned company in which the party owns ten percent or more of the outstanding
shares.

ANSWER: Plaintiff is not a publicly owned company.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER: The Charleston division is the division where a substantial part of the events or omissions giving rise to the claim occurred, the division in which Mr. Savage resides and the division where Mr. Savage's firm, The Savage Law Firm, does business relating to the events or omissions alleged.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

6. [*Defendants only.*] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: N/A.

7. [Defendants only.] If you consent that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: N/A.

Respectfully submitted,

s/Eric C. Poston

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November 5, 2019